

REMARKS

In the Office Action mailed January 12, 2007, the Examiner rejected claims 1-6 under 35 U.S.C. §102(a) as anticipated by John Poole, Model-Driven Data Warehousing, copyright 2003 (John); and rejected claims 1-2 under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 6,999,956 to Mullins.

By this Amendment, Applicants amend claim 1 to more clearly define the features of the present invention and cancel withdrawn claims 7-10 without prejudice or disclaimer. Applicants submit that the claim amendments do not introduce new matter and are supported by the disclosure (see, e.g., paragraphs 0024-0025).

35 U.S.C. §102(a) Rejection of Claims 1-6

The Examiner rejected claims 1-6 under 35 U.S.C. §102(a) as anticipated by John. Applicants respectfully traverse this rejection.

Claim 1 defines a system for enabling a Meta Object Facility (MOF) compliant service for a metadata resource. Moreover, claim 1, as amended, includes a combination of elements including, among other things, "a persistence interface between the connector and the metamodel repository, configured to instantiate via the resource-specific application programming interface at least one MOF compliant service for the connector based on one of the MOF models in the metamodel repository, the persistence interface registered at the metamodel repository to provide a call back interface during runtime."

In contrast to claim 1, John discloses model-driven warehousing including a data warehouse administration console coupled by a connection to a JMI-Enabled Metadata Service, which apparently loads a metamodel and generates a repository. John, pages 14-15. However, John is completely silent with respect to a persistence interface

between the connector and the metamodel repository. Nor does John provide any hint that the persistence interface is registered at the metamodel repository to enable the persistence interface to act as a call back interface during runtime. For at least these reasons, John fails to disclose at least the following feature of claim 1: "a persistence interface between the connector and the metamodel repository, configured to instantiate via the resource-specific application programming interface at least one MOF compliant service for the connector based on one of the MOF models in the metamodel repository, the persistence interface registered at the metamodel repository to provide a call back interface during runtime." Therefore, claim 1 is not anticipated by John, and the rejection under 35 U.S.C. §102(a) of claim 1 and claims 2-6, at least by reason of their dependency from independent claim 1, should be withdrawn.

Moreover, the Examiner appears to allege that John discloses the claimed "persistence interface" at page 13 (see "the J2EE connector Architecture"), page 14 (see "metamodel interoperability"), page 15 (see figure), and page 27. However, the figure at page 15 appears to merely depict a data warehouse administration console coupled by a connection to a JMI-Enabled Metadata Service, which is coupled to an OMG web server. Applicants fail to see how that figure and the mere mention of "metamodel interoperability" and "the J2EE connector Architecture" disclose the claimed aspects of the "persistence interface" recited in claim 1. For this additional reason, claim 1 is not anticipated by John, and the rejection under 35 U.S.C. §102(a) of claim 1 and claims 2-6, at least by reason of their dependency from independent claim 1, should be withdrawn.

Claim 4 depends from claim 1 and recites that the "the persistence interface is configured to provide instances of metadata objects and associations between

metadata objects according to the MOF compliant service.” The Examiner alleges that John’s statements regarding “metamodel interoperability” and “advanced functionality based on MOF/JMI Reflection” constitute the claimed feature of claim 4. Applicants disagree and fail to comprehend how those statements disclose the claimed features of claim 4. Claim 4 is thus not anticipated by John, and the rejection of claim 4 under 35 U.S.C. §102(a) should be withdrawn for this additional reason.

Claim 5 depends from claim 1 and recites that the “the metamodel repository includes a repository server configured to generate code for the MOF compliant service. The Examiner alleges that John’s statements regarding “metamodel interoperability” and “advanced functionality based on MOF/JMI Reflection” constitute the claimed feature of claim 5. Applicants disagree and fail to comprehend how those meager statements disclose the claimed features of claim 5. Claim 5 is thus not anticipated by John, and the rejection of claim 5 under 35 U.S.C. §102(a) should be withdrawn for this additional reason.

35 U.S.C. §102(e) Rejection of Claims 1-2

The Examiner rejected claims 1-2 under 35 U.S.C. §102(e) as anticipated by Mullins. Applicants respectfully traverse this rejection.

Mullins discloses a system for dynamic object-driven database manipulation and mapping which correlates or translates one type of database to another type of database or to an object programming application. Mullins describes correlation or translation as involving a relational to object translation, an object-to-object translation, a relational to relational translation, or a combination of the above. In short, Mullins

primarily addresses the problems associated with dynamic mapping of databases to selected objects, and does not address a Meta Object Facility (MOF) compliant service.

The Examiner appears to allege that Mullins at FIG. 1 discloses the claimed "persistence interface" recited in claim 1. The description of FIG. 1 reveals that Mullins is silent with respect to the above-noted features of claim 1. Specifically, Mullins describes FIG. 1 as follows:

FIG. 1 illustrates one such embodiment involving a request 100 by an object application 101 and the processing of such request. The system according to one embodiment of the present invention comprises an object schema 200 including meta data 201 corresponding to a data store schema 300, a first adapter 400, and a second adapter 500. In the preferred embodiment of the subject invention the object application 101 is a java applet "cocodemo java" as listed in Appendix A of U.S. Pat. No. 5,857,197 ('197 patent), issued Jan. 5, 1999.

One embodiment of the '197 patent invention used a user defined object view of an underlying non-object store, i.e. the object schema 200. The object schema 200 was accessed by an object application 101 through an abstract layer 600 which does the necessary conversions between object and non-object views. This abstraction allowed both kinds of data stores--object and non-object (e.g., relational)--to be accessed identically from at least one object application 101.

Moreover, by applying simple object streaming, the '197 patent invention was capable of accessing objects distributed over a three tier environment using exactly the same application program interface ("API ") 700 as the local two-tier environment. This was accomplished by using access "adaptive" technology comprising the adapter abstraction layer 600.

The adapter abstraction layer 600 of the '197 patent performs any translation work necessary for converting objects to both object data stores 312 and non-object data stores 302. The adapter abstraction layer 600 provided a consistent API 700 for both object and non-object data stores and enables application programmers to migrate between various object stores without application modification. The adapter abstraction layer 600 also facilitated

communication with a remotely available second adapter 500
without modifying the object application 101 programming logic.

Mullins, col. 8, lines 3-38.

As demonstrated by the above passage, Mullins, at best, describes an "abstract layer 600" for performing the necessary conversions between object and non-object views. Because the Mullins abstract layer 600 does not constitute the "claimed "persistence interface," Mullins is completely silent with respect to a persistence interface between the connector and the metamodel repository, much less a persistent interface registered at the metamodel repository to enable the persistence interface to act as a call back interface during runtime. For at least these reasons, Mullins fails to disclose at least the following feature of claim 1: "a persistence interface between the connector and the metamodel repository, configured to instantiate via the resource-specific application programming interface at least one MOF compliant service for the connector based on one of the MOF models in the metamodel repository, the persistence interface registered at the metamodel repository to provide a call back interface during runtime." Therefore, claim 1 is not anticipated by Mullins, and the rejection under 35 U.S.C. §102(a) of claim 1 and claims 2, at least by reason of its dependency from independent claim 1, should be withdrawn.

CONCLUSION

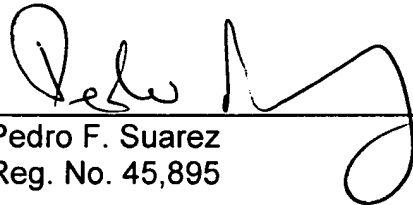
Applicants respectfully request that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner. Applicants submit that the proposed amendments do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner. Therefore, this Amendment should allow for immediate action by the Examiner. Finally, Applicants submit that the entry of the amendment would place the application in better form for appeal, should the Examiner continue to dispute the patentability of the pending claims.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below. No fee is believed to be due, however, the Commissioner is hereby authorized to charge any fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-089-UTL.

Respectfully submitted,

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